

ORIGINAL

CLERK OF DISTRICT COURT  
NORTHERN DISTRICT OF TX  
FORT WORTH DIVISION  
FILED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

2023 APR 17 PM 3:37

Cause No.: **4-23CV-371-0**

DEPUTY CLERK *[Signature]*

|                                  |   |  |
|----------------------------------|---|--|
| LEWIS BROOKS MCKENZIE,           | ) | In a removal from the 233 <sup>rd</sup> Judicial |
| Plaintiff-Petitioner,            | ) | District Court of Tarrant County, TX             |
|                                  | ) | State case number: 233-651265-18                 |
| v.                               | ) |  |
|                                  | ) |  |
| STATE OF TEXAS, HOLLY HAYES, and | ) |  |
| KELLI MARIE (RAYBURN) MCKENZIE,  | ) | FORMAL DEMAND FOR JURY TRIAL                     |
| Defendant-Respondents.           | ) |  |
|                                  | ) | CONSTITUTIONAL CHALLENGES                        |
|                                  | ) |  |
|                                  | ) | INJUNCTIVE RELIEF REQUESTED                      |

TO THE CLERK: THIS IS A "STANDALONE" FILING, NOT A "SUPPORTING" ITEM

**Affidavit of Lewis Brooks McKenzie on Widespread Corruption**

Now hereby I the affiant, Lewis Brooks McKenzie, do declare under penalty of perjury that the following facts are true and correct to the best of my information and belief:

**FACT:** I am an undersigned Plaintiff in this action, a victim of the serious crimes herein and below described, and I also therefore have personal direct knowledge upon the same matters.

**FACT:** The State of Texas, the Texas state bar association and particularly all "family law" related training and disciplinary units, agencies, committees, chairpersons, directors thereof, along with all county bar associations and their officers, all quasi-governmental-professional entities related to the Texas state family law system, and necessarily all such Texas state domestic relations judges along with all such family law attorneys who practice before the same judges daily in routine, have all always known, each and every one of them, both expressly and implicitly, that no state court, nor any other part and/or officer and/or other actor of the state

apparatus, may ever remove, take away, suspend, interfere with, diminish or otherwise impact, change and/or otherwise impinge, alter, or even so much as harass, in any way or amount, the protected superior legal status and all associated fundamental constitutional rights of every pair of fit natural parents to their equally enjoyed and equally vested rights regarding their own care, custody, control and management of their any natural minor children, without first the state and its officially-designated officers proving, and that only achievable lawfully if proven by clear and convincing evidence admitted under fully valid due process protection procedures, that either such natural parent is actually guilty of some very serious form and/or effect of child abuse, neglect, and/or abandonment.

**FACT:** Each and every one of the above same entities and legal professionals has long known and well knows that for decades within Texas there have been clear and plainly established statutory causes of action with related procedures for termination of parental rights (“TPR”) cases regarding alleged serious acts of abuse, neglect and/or abandonment by parents of their natural children, i.e., under the state’s *parens patriae* jurisdictional authority presumed upon good cause shown for resolving such situations to the safety and well-being interests of such personally-affected minor children.

**FACT:** Each and every above same “family law” court officer, i.e., all such Texas state judicial officers described herein, as well as all such state-licensed “family law” attorneys described herein, are each and all fully well aware that they have absolutely no lawful business or any other bona fide interest of any kind, whatsoever, attempting to in any way either impact or otherwise disturb the pre-existing and superior constitutional rights and interests of any natural parent to the care, custody, control and management of his/her any natural minor children - no

valid business or any lawful interest whatsoever - except and solely limited to and via the above same well established actions at law with related procedures for such “TPR” cases.

**FACT:** Each and every above same “family law” court officer, i.e., each such Texas state judicial officer described herein, as well as each such state-licensed “family law” attorney described herein, further well knows, and not a single one of them may even attempt to deny, that they each and all understand fully that the clear and convincing evidentiary standard is required at minimum within the context of any action at law supposing to impact the custody of any minor, and accordingly they each and all understand fully that the mere preponderance evidentiary standard being used by and within their same Texas “family law” courts is most certainly not constitutionally sufficient for any proposed impact to any natural parent’s child custody rights, i.e., they well know that every such case processed under the wrong evidentiary standard is constitutionally void and of no true legal effect whatsoever, yet they all nevertheless still continue every day to criminally conspire with creating yet more of exactly the same fatally insufficient and constitutionally void cases, along with further knowingly fictitious and fraudulent creations of multiple if not numerous false state records per and within each and every such individually different said domestic relations case (their willfully ongoing false creations of knowingly fraudulent and knowingly unconstitutional court orders, i.e., multiple knowingly criminal creations of fraudulent state records within each and every such “family law” case), and we’re talking about thousands upon thousands of new, additional fraudulent state records created knowingly falsely every business week, i.e., also fraudulently and endlessly costing yet millions upon even more millions of frivolously wasted taxpayer dollars.

**FACT:** Each and every above same “family law” court officer, i.e., all such Texas state judicial officers described herein, as well as all such state-licensed “family law” attorneys

described herein, further well knows, and not a single one of them may even attempt to deny, that both natural parents are absolutely equal in the eyes of the law, that both are constitutionally presumed to be and must be treated as fit and equal parents in all respects at all times unless one or both were first proven seriously unfit under full due process as above described, and therefore necessarily also that within any question of the care, custody, control and management of minor children between every such fit pair of natural parents coming before any such state court for any reason that the only constitutionally-compliant act by such state court in regards to such children is simply to recognize, uphold and enforce those equally-shared rights and interests of both natural parents equally in all respects, specifically requiring that both such legally-fit and legally-equal natural parents shall equally share their child/ren in all physical time possession rights, all decision-making rights, and just as equally within all other legal responsibilities, rights, and interests, i.e., absolutely equal and fully-shared retention of all said same pre-existing and superior-to-the-state parental rights to their same child/ren.

**FACT:** Each and every above same “family law” court officer, i.e., each such Texas state judicial officer described herein, as well as each such state-licensed “family law” attorney described herein, further well knows, and not a single one of them may even attempt to deny, that the Texas state “family law” industry of all such judges and attorneys described herein are absolutely guilty *en masse* of knowingly defrauding away the fundamental constitutional rights and interests of approximately one-half of all such natural parents entering their state “family law” courts within the above-described manners, i.e., absolutely guilty, in each and every such different individual state “family court” case, of criminally conspiring in that creation of yet another wholly false, utterly fictitious and fraudulent state court “order” manifestly pretending to “grant” or “award” custody of any child or children to only one of the both same such fit and

equal natural parents, as neither the state nor any such court or state judicial officer has themselves any such actual legal custody of said children to even give away (“award” or “grant”) to anyone else, in the first place, let alone that both such natural fit parents already and both have full, equal and complete custodial rights of their child/ren.

**FACT:** Each and every above same “family law” court officer, i.e., each such Texas state judicial officer described herein, as well as each such state-licensed “family law” attorney described herein, further well knows, and not a single one of them may even attempt to deny, that within some 97-98% of all such Texas domestic relations cases there have not even been any allegations of any actual serious child abuse, neglect or abandonment by or against either of the two given natural parents involved, hence in all such cases there has never been even the first iota of any constitutional jurisdiction or basis to even begin to question the permanent retention by either and/or both such natural parents of their respective child custodial rights shared fully equally between them, and hence each and every such judge and attorney further knows fully and all too well, and not a single one of them may attempt to deny, that they knowingly are criminally conspiring to completely defraud all the rights and interests - and monies - of \*both\* same parents \*and\* their child/ren involved, by each time arbitrarily and capriciously and utterly falsely “awarding” or “granting” somehow magical and sudden “primary” (disparately superior) child custody rights and interests of and by one of the given parents over and above the other equally-fit and equally-entitled natural parent.

**FACT:** Each and every above same “family law” court officer, i.e., each such Texas state judicial officer described herein, as well as each such state-licensed “family law” attorney described herein, further well knows, and not a single one of them may even attempt to deny, that they know that actually adhering to their own ethical duties for constitutional compliance

with upholding equal rights and equal justice in equal fashion to both equally fit natural parents in those 97-98% of all such cases wherein no serious parental unfitness exists would mean also that in the same 97-98% of cases there would be nothing at all to do with respect to any child custody rights, since the only possible lawful and constitutionally-required result in and for each and all such cases is automatic implementation of fully true and equally-shared (“50/50”) child custody without any falsely-created ongoing transfers of extorted wealth disguised in the form of so-called “child support” ongoing payments from their falsely-targeted-and-victimized, so-called “noncustodial” parent, and hence without anything to do anymore in 97-98% of all such cases as auto-required 50/50 custody, so would go away likewise 97-98% of their falsely and fraudulently created/charged billable hours, i.e., that very same 97-98% of their collectively conspired unjust enrichment schemes being criminally foisted upon all of the good parents, children, people and citizens of not just all across Texas, but obviously all across the rest of this “free” nation as well.

**FACT:** Each and every above same “family law” court officer, i.e., each such Texas state judicial officer described herein, as well as each such state-licensed “family law” attorney described herein, further well knows, and not a single one of them may even attempt to deny, that said judges knowingly and willfully and routinely allow the same said attorneys to “drum up” their business and thereby-falsified billable hours by unconstitutionally engaging in any and all endless manners of frivolously irrelevant issues with respect to “arguing” about “which” parent should be “awarded” or “granted” custody of their child/ren in the context of non-existent parental unfitness (let alone wholly frivolously under the mere and fatally insufficient preponderance evidentiary standard), i.e., each and every such judge and attorney in the State of Texas is criminally guilty beyond any shadow of doubt in regards to all of these ongoing acts of felony barratry routinely committed by all such “family law” attorneys on a daily basis, and

culpable within those daily conspiracies to commit the same racketeering enterprise crimes upon the entire general public *en masse*.

**FACT:** Each and every above same “family law” court officer, i.e., each such Texas state judicial officer described herein, as well as each such state-licensed “family law” attorney described herein, further well knows, and not a single one of them may even attempt to deny, that no judge may ever preside over any case in which the judge has the slightest any pecuniary interest, which is exactly what they instead criminally conspire in and perpetrate daily, in very large measure indeed, as the direct and knowing daily corruption of fundamental due process occurring within each and every single action to either create and/or enforce any Title IV-D child support lien falsely and fraudulently created within and by the very same given County, as they all also already know that the same judges (as well as that County’s clerks and prosecutors, and the County itself) each get their own “cut of the pie” of all such Title IV-D monies collected routinely from their crime victims, i.e., collected from the very same so-called and falsely-created “noncustodial” parents whom they relentlessly perpetrate egregiously false and malicious prosecutions against to criminally line their own dishonest pockets deeper and deeper with, and within the same additional racketeering enterprise crimes inflicted upon the entire general public *en masse*, each and every same such judge and attorney well further knows that they are likewise simultaneously defrauding the Title IV-D federal reimbursement program by each and every corresponding false claim therefore submitted to the federal government for such falsified reimbursement purpose, i.e., each and every such judge and attorney well knows they are all knowingly defrauding the United States and all federal taxpayers on a routine and daily basis.

**FACT:** Not only are the raw and sheer number of above described knowing acts of various state and federal felonies perpetrated by each and every same judge and attorney statewide easily

well into the thousands of individually chargeable crimes per any given business week, all such judges and attorneys are clearly also “bottomless pit” deep into refusing to obey many if not most of the various provisions of their mandatory ethics rules in general, not to mention also uniformly refusing to obey the particular mandatory ethics rule to withdraw from any case prior to and instead of aiding or abetting or even perpetrating any crime whatsoever, not to also mention their same equally criminal conspiracy in *de facto* pattern, practice and/or policy to likewise uniformly conceal and cover up all such manifest crimes and overwhelmingly egregious professional misconduct against their own ethics rules by refusing to report such manifest misconduct by other legal professionals to the various proper authorities including both, to professional disciplinary authorities, and also to state and/or federal law enforcement authorities.

**FACT:** Within **\*\*each and every\*\*** such clearly false and fraudulent, constitutionally-repugnant Texas “family law” case altering pre-existing child custody rights and/or interests of any natural parent without even the existence of any such actual serious parental unfitness even alleged, let alone actually first proven under the required full due process aspects, each and every same such Texas judge and attorney complicit therein is obviously also therefore necessarily and 100% conclusively guilty under criminal law for no less than **\*\*at least\*\*** one (1) Count of knowingly, willfully, and intentionally violating each and every single one of the following penal proscriptions, and typically guilty of multiple Counts of most of the following same, and further typically guilty of other assorted crimes in each individual case, i.e., literally guilty of an entire proverbial “pirate’s bounty” of numerous state and federal felony and misdemeanor charges:

- 1) *Always in every case* at least one **felony** Count of FALSE STATEMENT TO OBTAIN PROPERTY, in violation of Texas Penal Code, Title 7, Section 32.32;

- 2) *Always in every case* at least one **felony** Count of SECURING EXECUTION OF DOCUMENT BY DECEPTION, in violation of Texas Penal Code, Title 7, Section 32.46;
- 3) *Always in every case* at least one **felony** Count of BRIBERY, in violation of Texas Penal Code, Title 8, Section 36.02;
- 4) *Always in every case* at least one Class A **misdemeanor** Count of IMPROPER INFLUENCE, in violation of Texas Penal Code, Title 8, Section 36.04;
- 5) *Always in every case* at least one **felony** Count of TAMPERING WITH WITNESS, in violation of Texas Penal Code, Title 8, Section 36.05;
- 6) *Always in every case* at least one **felony** Count of OBSTRUCTION OR RETALIATION, in violation of Texas Penal Code, Title 8, Section 36.06;
- 7) *Always in every case* at least one **felony** Count of either PERJURY or AGGRAVATED PERJURY, in violation of Texas Penal Code, Title 8, Sections 37.02 or 37.03;
- 8) *Always in every case* at least one **felony** Count of TAMPERING WITH OR FABRICATING PHYSICAL EVIDENCE, in violation of Texas Penal Code, Title 8, Section 37.09;
- 9) *Always in every case* at least one **felony** Count of TAMPERING WITH GOVERNMENTAL RECORD, in violation of Texas Penal Code, Title 8, Section 37.10;
- 10) *Always in every case* at least multiple **felony** Counts of BARRATRY, in violation of Texas Penal Code, Title 8, Section 38.12, and further noting that sub-section (i) thereunder expressly reminds that "*Final conviction of felony barratry is a serious crime for all purposes and acts, specifically*

*including the State Bar Rules and the Texas Rules of Disciplinary Procedure.” (emphasis added);*

- 11) *Always in every case* multiple **felony** Counts of ABUSE OF OFFICIAL CAPACITY, in violation of Texas Penal Code, Title 8, Section 39.02;
- 12) *Always in every case* multiple Class A **misdemeanor** Counts of OFFICIAL OPPRESSION, in violation of Texas Penal Code, Title 8, Section 39.03;
- 13) *Always in every case* at least one **felony** Count under 18 U.S. Code § 3 - ACCESSORY AFTER THE FACT (1/2 of the other sentence for **each** act);
- 14) *Always in every case* at least one **felony** Count under 18 U.S. Code § 4 - MISPRISION OF FELONY (3 years for **each** act);
- 15) *Always in every case* at least one **felony** Count under 18 U.S. Code § 241 - CONSPIRACY AGAINST RIGHTS (10 years for all basics for **each** act);
- 16) *Always in every case* at least one **felony** Count under 18 U.S. Code § 242 - DEPRIVATION OF RIGHTS UNDER COLOR OF LAW (1 year for all basics for **each** act);
- 17) *Always in every case* at least one **felony** Count under 18 U.S. Code § 371 - CONSPIRACY TO COMMIT OFFENSE OR TO DEFRAUD UNITED STATES (5 years for **each** act);
- 18) *Always in every case* at least one **felony** Count under 18 U.S. Code § 880 - RECEIVING THE PROCEEDS OF EXTORTION (3 years for **each** act);
- 19) *Always in every case* at least one **felony** Count under 18 U.S. Code § 1001 - STATEMENTS OR ENTRIES GENERALLY (5 years for **each** act);

- 20) *Always in every case* at least one **felony** Count under 18 U.S. Code § 1002 - POSSESSION OF FALSE PAPERS TO DEFRAUD UNITED STATES (5 years for **each act**);
- 21) *Always in every case* at least one **felony** Count under 18 U.S. Code § 1341 - FRAUDS AND SWINDLES (20 years for **each act** of “mail fraud”) (Note: See 18 U.S. Code § 1346 for the definition of “scheme or artifice to defraud” which clarifies, “For the purposes of this chapter, the term “scheme or artifice to defraud” **includes a scheme or artifice to deprive another of the intangible right of honest services.**”) (emphasis added);
- 22) *Always in every case* at least one **felony** Count under 18 U.S. Code § 1343 - FRAUD BY WIRE, RADIO, OR TELEVISION (20 years for **each act** of “wire fraud”) (Note: See 18 U.S. Code § 1346 for the definition of “scheme or artifice to defraud” which clarifies, “For the purposes of this chapter, the term “scheme or artifice to defraud” **includes a scheme or artifice to deprive another of the intangible right of honest services.**”) (emphasis added); and,
- 23) *Always in every case* at least one **felony** Count under 18 U.S. Code § 1964 - CIVIL REMEDIES (RICO jurisdiction of same matters) (against all co-conspirators);

Think some of these might not apply? Think again: Every single element of each above state and federal felony and misdemeanor offense by the same state judges and attorney officer-conspirators is *\*already\** proven conclusively in black-and-white... indeed, *by their own hands*.

Pursuant to Texas Penal Code, Title 2, Chapter 7, *Criminal Responsibility for Conduct of Another*, also to Texas Penal Code, Title 4, Chapter 15, *Preparatory Offenses*, and to the various

equal and equivalent sections under Title 18 of the United States Code, all such same state judges and attorneys, as joint tortfeasors in conspiracy, are all already guilty and liable for affirmative acts towards and/or also neglects to prevent aiding, abetting, and/or attempting to conceal the various felony and misdemeanor crimes perpetrated *by any other officer* of any of the same courts against various and multiple sections of the Texas Penal Code (state crimes herein) and also of such various crimes against Title 18 of the United States Code (federal crimes herein), because within a criminal conspiracy the law is well-established that any contributing act performed by any individual of the conspiracy is chargeable unto the other individuals within the same conspiracy regardless whether they even knew of the given separate act, as well as also being additionally guilty and liable in regards to all of their own affirmative individual and/or joint criminal acts and/or omissions perpetrated in such crimes and related matters, to say nothing of serious causes of action like abuse of office, abuse of power, official misconduct, false and malicious prosecution, gross negligence, tortious interference with rights, violations of civil rights, intentional inflictions of emotional distresses, breaches of duties to prevent harm, breaches of fiduciary duties, and so forth.... and of which any two (2) or more particular types of triggering predicate acts (and there are *many* such predicate acts involved herein) shall and do also invoke RICO/Racketeering charges as mentioned above.

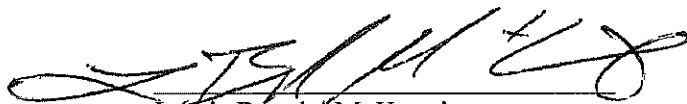
Naturally also, each and every judge ever having so acted fraudulently with each such state court case should and must now by law be removed from office pursuant to any of the alternative provisions mandated under Article XV of the Texas Constitution, *see also* Texas Government Code, Section 24.021, Section 33.038, and etc., *see also* Article V, Section 1-a(6) and Section 24 of the Texas Constitution, and likewise, all of the instant state court clerks could also by law be similarly removed from office pursuant to Article V, Section 9 and Section 24 of the Texas

Constitution, *see also* Texas Government Code, Section 51.322 and etc., while obviously also all of the willfully dishonest and criminally-acting attorneys therein, including all of the individual attorneys herein, should and must by law be disbarred permanently and forever from the practice of law (and with the standard reciprocal notices sent unto the state bar associations of all other 49 sister States and Commonwealths as well as the District of Columbia) pursuant to Texas Government Code, Section 82.061 and Section 82.062, as well as per others.

**FACT:** I the undersigned Affiant am a direct victim of all of the same above detailed racketeering and other crimes against the well-established law and rights as perpetrated within and regarding my own state case history by the individual state court officers themselves engaged therein – indeed, even much worse than the standard criminality – and therefore I am entitled to have corresponding criminal prosecutions initiated forthwith against them each and all, and further to be reasonably compensated for all of the many egregious injuries falsely inflicted upon my parent-child relationship rights, my other constitutional rights, my person, my name and reputation, my property, my monies, my credit rating, and so forth, including for all consequential damages, losses of use, loss of economic advantage and/or opportunity, and so forth, and further that all such damages are trebled due to such manifest fraud, plus punitive and/or other special damages awarded, along with being actually made constitutionally whole again by this Court, i.e., to compel the full and immediate return of all such false “child support” thefts of my wealth, income and monies, plus with interest as by law provided, and likewise compel all reasonably available physical restoration of all of my physical parenting time that I was always constitutionally entitled unto from the very moment in original inception, i.e., to immediately compel the corresponding total such same “make-up” amount of all of my falsely stolen physical parenting time in accelerated fashion to, as much as is reasonably possible,

restore all or at least most of that fully-equal total of all such parenting time I have been falsely deprived of, starting immediately now and continuing in either majority or exclusive possession as reasonably necessary without pause until all such missing parenting time is fully restored in entirety or until the date there is no longer a minor child herein due to reaching adulthood, whichever occurs first.

Respectfully submitted,

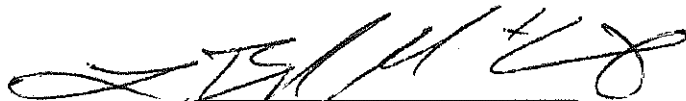


Lewis Brooks McKenzie  
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Clarksville, Texas 75426  
Tel: 972-837-5678  
Email: LBMTCU@gmail.com  
*Plaintiff-Petitioner Party of Record*

VERIFICATION

I hereby declare, verify, certify and state, pursuant to the penalties of perjury under the laws of the United States, and by the provisions of 28 USC § 1746, that all of the above and foregoing representations are true and correct to the best of my knowledge, information, and belief.

Duly executed at Fort Worth Texas, upon this \_\_\_\_17\_\_\_\_ day of April, 2023.



Lewis Brooks McKenzie

CERTIFICATE OF SERVICE

I hereby certify: that on this 17 day of April, 2023, a true and complete copy of the above *notice of and verified petition for removal and criminal complaint upon human trafficking*, by depositing same via certified first class postage prepaid mail, RRR via USPS, if not performed via formal process server, has been duly served upon:

*(Statutory Intervenor United States)*  
c/o U.S. Attorney General Merrick Garland  
Office of the United States Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

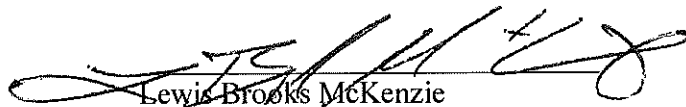
*(Statutory Intervenor United States)*  
c/o U.S. Attorney Ashley C. Hoff  
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*(Cross-Defendant State of Texas)*  
State of Texas  
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*(Cross-Defendant State of Texas)*  
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*(Cross-Defendant Holly Hayes)*  
Holly Hayes  
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*(Counter-Defendant Kelli Marie (Rayburn) McKenzie)*  
Kelli Marie (Rayburn) McKenzie  
7913 Hannah St  
Plano, TX 75025-6203

  
Lewis Brooks McKenzie